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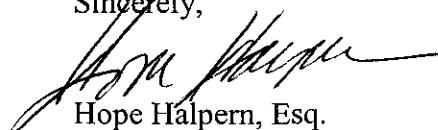
Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St. S.W.  
Washington, DC 20554

Re Annual Customer Proprietary Network Information Compliance  
Certification; EB Docket No. 06-36

Dear Ms. Dortch:

Please find the attached Annual Customer Proprietary Network Information ("CPNI") Compliance Certification for Golden Holdings, Inc. Please call me if you have any questions regarding this filing.

Sincerely,



Hope Halpern, Esq.

Encls.  
cc: BCPI  
Byron McCoy

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**Annual 47 C.F.R. S: 64.2009(e) CPNI Certification of  
Golden Holdings, Inc.  
2007  
EB Docket 06-36**

Date Filed: February 25, 2008  
Form 499 Filer ID: 826833  
Name of Signatory: Julia Marx  
Title of Signatory: Assistant Secretary

I, Julia Marx, certify that I am an officer of Golden Holdings, Inc. ("Golden Holdings"), and acting as an agent of Golden Holdings, I have personal knowledge that Golden Holdings has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. S: 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how Golden Holdings' procedures ensure that it is in compliance with the requirements set forth in Section 64.2001 et seq. of the Commission's rules.

Golden Holdings has not taken any actions (proceedings instituted or petitions filed by a company at either state commission, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

Golden Holdings has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed \_\_\_\_\_

  
Julia Marx  
Assistant Secretary

**Golden Holdings, Inc.**  
2831 Twenty-Ninth Street, NW  
Washington, DC 20008 USA

Phone 202.332.5997  
Fax 202.332.4877

**STATEMENT REGARDING OPERATING PROCEDURES IMPLEMENTING 47 C.F.R.  
SUBPART U GOVERNING THE USE OF CUSTOMER PROPRIETARY NETWORK  
INFORMATION ("CPNI")**

Golden Holdings, Inc. ("Golden Holdings"), has established policies and procedures to assure compliance with Part 64 of Title 47 of the Code of Federal Regulations, Subpart U – Customer Proprietary Information ("CPNI") § 64.2001et. seq. of the Commission's rules.

Golden Holdings operates as a provider of wholesale international services, and provides retail services only to business customers. Provisions regarding the treatment of customer CPNI by Golden Holdings are specifically addressed in customer contracts, and each business customer is assigned its own designated account representative.

**I. Notice Required For Use of CPNI**

Golden Holdings has not provided notification to its customers and has not asked for approval to use CPNI because Golden Holdings does not use CPNI outside of the areas that are allowed without customer approval. Golden Holdings does not share customers CPNI with any joint venture partner, independent contractor or any other third party. ***In the event that at a future time Golden Holdings decides to use CPNI in a manner that requires customer approval, it will do so in accordance with the approval and notice requirements specified in 47 CFR §§ 64.2007- 64.2008 of the Commission's rules.***

**II. Safeguards on the Disclosure of Customer Proprietary Network Information.** Golden Holdings has procedures in place to assure that customers are properly authenticated prior to disclosing CPNI. Golden Holdings will properly authenticate a customer prior to disclosing CPNI as follows:

**(a) In person** – the customer must be personally known by the employee or the customer must provide a valid photo ID matching the customer's account information.

**(b) Telephone access to CPNI.** Golden Holdings will only disclose call detail information over the telephone, based on customer-initiated telephone contact, if the customer first provides Golden Holdings with a password, as described in paragraph (d) below that is not prompted by the carrier asking for readily available biographical information, or account information. If the customer does not provide a password, Golden Holdings will only disclose call detail information by sending it to the customer's address of record, or by calling the customer at the telephone number of record. If the customer is able to provide call detail information to Golden Holdings during a customer-initiated call without Golden Holdings' assistance, then Golden Holdings may discuss the call detail information provided by the customer.

**(c) Online access to CPNI.** Golden Holdings will authenticate a customer without the use of readily available biographical information, or account information, prior to allowing the customer online access to CPNI related to a telecommunications service account. Once authenticated, the customer may only obtain online access to CPNI related to a telecommunications service account through a password that is not prompted by Golden Holdings asking for readily available biographical information, or account information.

**(d) Establishment of a Password and Back-up Authentication Methods for Lost or Forgotten Passwords.** To establish a password, Golden Holdings must authenticate the customer without the use of readily available biographical information, or account information. Golden Holdings may create a back-up customer authentication method in the event of a lost or

forgotten password, but such back-up customer authentication method may not prompt the customer for readily available biographical information, or account information. If a customer cannot provide the correct password or the correct response for the back-up customer authentication method, the customer must establish a new password as described in this paragraph.

**(e) Notification of account changes.** Golden Holdings will promptly notify customers immediately whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed. This notification may be through a voicemail or text message sent by Golden Holdings to the telephone number of record, or by mail to the address of record, and will not reveal the changed information or be sent to the new account information.

**(f) Business customers** – at this time, the only retail services provided by Golden Holdings are to business customers. Golden Holdings and its customers address issues of CPNI protection specifically in their contracts, and these may or may not differ somewhat from the authentication procedures identified in paragraphs (a) through (e) above. Golden Holdings' business customers each have a dedicated account representative.

**III. Notification of Customer Proprietary Network Information Security Breaches.** – In the case of a breach, Golden Holdings will as soon as practicable, and in no event later than seven (7) business days, after reasonable determination of the breach, electronically notify the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) through the FCC link at <http://www.fcc.gov/eb/cpni>.

(a) Notify customers only after 7 full business days have passed after notification to the USSS and the FBI unless the USSS or FBI has requested an extension.

(b) If there is an extraordinarily urgent need to notify affected customers or the public sooner in order to avoid immediate and irreparable harm, it will be done only after consultation with the relevant investigating agency. Golden Holdings shall cooperate with the relevant investigating agency's request to minimize any adverse effects of such customer notification.

(c) Maintain a record of any breaches discovered, notifications made to the USSS and the FBI and notifications made to customers. The record will include if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach. Golden Holdings shall retain the record for a minimum of 2 years.

(d) Include a summary of the breach in the annual compliance certificate filed with the FCC.

#### **IV. Record Retention**

Golden Holdings shall retain all information regarding CPNI. Following are the minimum retention periods Golden Holdings has established:

- CPNI notification and records of approval if used – five years
- Marketing campaign if used – one year
- Breaches: five years
- Annual Certification – five years
- Employee training certification – five years
- All other information – two years.